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Plaintiffs' Co-Lead Counsel

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**DECLARATION OF DEREK W. LOESER
AND LESLEY E. WEAVER IN SUPPORT
OF PLAINTIFFS' MOTION FOR FINAL
SETTLEMENT APPROVAL**

Judge: Hon. Vince Chhabria
Courtroom: 4, 17th Floor
Hearing Date: September 7, 2023
Hearing Time: 1:00 p.m.

I, Derek W. Loeser, and I, Lesley E. Weaver, declare and state as follows:

1. Derek W. Loeser is a partner at the law firm of Keller Rohrback L.L.P. (“Keller Rohrback”) and Lesley E. Weaver is a partner at the law firm of Bleichmar Fonti & Auld LLP (“Bleichmar Fonti & Auld”). We are Co-Lead Counsel for Plaintiffs in the above-captioned matter. We submit this declaration in support of Plaintiffs’ Notice of Motion and Motion for Final Settlement Approval (the “Motion”). Specifically, we submit this declaration in support of Class Counsel’s final approval of the Class Settlement.

2. We have personal knowledge of the information contained herein, and, if either of us is called as a witness, we each could and would testify competently thereto.

Direct Communications with Counsel About the Settlement

3. 1,604 individuals have communicated directly with members of our law firms about the Settlement. The overwhelming majority of the communications have concerned whether someone is a class member, how to file a claim, and questions about other similar information.

4. Under our direction, colleagues at our law firms have responded to all but 20 of the 1,604 individuals who have contacted us. For 19 of those 20, we either could not respond because the individual did not provide accurate contact information, or we have attempted to respond to the phone number the individual left but no one picked up and we were unable to leave a message because the voicemail box was full. Where we have been unable to leave a message, we have attempted to contact the individual more than once. In addition, Plaintiffs did not respond to one communication from an individual about the Settlement because the communication appeared to present safety concerns.

Communications About the Settlement Forwarded to Counsel By the Court

5. The Court has stated that it will transmit all objections it receives to the parties’ counsel. Dkt. 1131. As of July 10, 2023, Plaintiffs’ counsel has received 43 objections from the Court. (These objections were filed by 38 objectors; several objectors have submitted more than one objection.) We have attached each of those objections to the Notice of Objections to Class

Action Settlement as of July 10, 2023, Dkt. 1144, and have redacted any sensitive information from them, as ordered by the Court. Dkt. 1131. Plaintiffs will file objections they receive from the Court after July 10, if any, by July 30. *See id.*

6. Several claim forms have been sent to the Court, instead of to the Settlement Administrator. Dkt. 1132. The Court has stated that it will transmit any claim forms it receives to us. *Id.* We have, in turn, forwarded each claim form we have received from the Court so far to the Settlement Administrator.

Exhibits

7. Attached hereto as **Exhibit 1** is a true and correct copy of the Declaration of Steven Weisbrot of Angeion Group, LLC in Support of Motion for Final Approval of Class Action Settlement, dated July 11, 2023.


8. Attached hereto as **Exhibit 2** is a true and correct copy of the Declaration of Jenny Shawver of Angeion Group, LLC re: ClaimClam Communications, dated July 11, 2023.

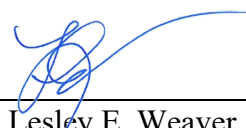
9. Attached hereto as **Exhibit 3** is a true and correct copy of the “Authorized Agent Agreement” from Communion Inc. (d/b/a ClaimClam), available at <https://www.getclaimclam.com/> (last visited July 11, 2023).

10. Attached hereto as **Exhibit 4** is a true and correct copy of the claim form in *Snyder v. Ocwen Loan Servicing, LLC*, Case No. 1:14-cv-08461 (N.D. Ill.), filed at Dkt. 252-1.

We declare under penalty of perjury that the foregoing is true and correct and to the best of our knowledge.

Dated: July 11, 2023

By: 
Derek W. Loeser

By: 
Lesley E. Weaver